Comments "DOT Chart 13"

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organization:

**comments:** Special Provision 188(a) of 49 CFR Part 172.102 requires that packages containing primary lithium batteries or cells be marked "PRIMARY LITHIUM BATTERIES - FORBIDDEN FOR TRANSPORT ABOARD PASSENGER AIRCRAFT" or "LITHIUM METAL BATTERIES - FORBIDDEN FOR TRANSPORT ABOARD PASSENGER AIRCRAFT" as one of the conditions of exception. There are also size requirements that should be included. SP 188(f)(1) also requires that packages containing more than 24 cells or 12 batteries be marked to indicate that the package contains lithium batteries and that special procedures should be followed in the event that the package is damaged. For Lithium batteries to quanlify for exceptions in ICAO TI a new label is reugired to be applied. However that rule has not been adopted by US DOT. Previous comments already have mentioned the redesigned CAO label and the new excepted quantity label. Both of which are effective, but not mandatory. I also agree that it would be helpful to post an electronic version of the final chart on your website. I realize that the chart is available for purchase for a fee, but it is also sent out at no cost as part of the Infopack (printed) and on the Digipack (electronic). If you post it to the website that might reduce your costs.